

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Declaratory Ruling and Petition)	RM-8503
for Rulemaking on Live Closed Captioning)	CG Docket No. 05-231
Quality Metrics and the Use of Automated)	
Speech Recognition Technologies)	

MOTION FOR EXTENSION OF TIME

Pursuant to 47 C.F.R. § 1.46, the National Association of Broadcasters (NAB)¹ and NCTA – The Internet & Television Association² hereby request that the Commission grant an extension of the comment and reply comment deadlines in response to the above-captioned Petition.³ Comments are currently due on September 13, 2019 and reply comments on September 30, 2019. NAB and NCTA respectfully request a brief extension of these deadlines until October 15, 2019 and October 30, 2019, respectively.⁴ Specifically, we request an extension to provide both industry and advocacy organizations time to prepare

¹ NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and also broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² NCTA – The Internet & Television Association is the principal trade association for the U.S. cable industry, representing more than 200 cable program networks as well as cable operators that serve nearly 80 percent of the nation’s cable television customers. Cable program networks reach nearly 90 million U.S. television households and have invested more than \$430 billion in award-winning news, sports, and entertainment content since 1997. The cable industry also is the nation’s largest provider of broadband service after investing over \$290 billion over the last two decades to deploy and continually upgrade networks and other infrastructure, which has helped spur more than a decade of innovation in the streaming television space, with tens of millions of consumers accessing billions of minutes of online programming each year.

³ Petition for Declaratory Ruling and Petition for Rulemaking, Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI) *et al.*, CG Docket No. 05-231, RM-8503 (filed July 31, 2019) (Petition).

⁴ NAB requests a 30-day extension of these deadlines. The first business day 30 days after September 13, 2019 is Tuesday, October 15, 2019. 47 C.F.R. § 1.4(e).

comments that reflect closed captioning quality discussions that will take place during an upcoming conference among NAB, NCTA and representatives of deaf and hard of hearing advocacy organizations on October 2, 2019.

NAB and NCTA request this extension to ensure that interested parties may fully assess the complex policy and technical issues raised in the Petition and better inform the Commission's consideration and resolution of it as well. In particular, an extension will allow stakeholders to build and review a more comprehensive record. Pursuant to a proposal the Commission supported in the 2014 Caption Quality Report and Order, NAB and NCTA continue to sponsor regular conferences with representatives of the deaf and hard of hearing communities and other interested parties to discuss developments in captioning technology and other relevant issues.⁵ These conferences provide a forum for the participants to frankly assess the state of closed captioning. Since the first conference, participants have jointly identified areas of advancement as well as areas where further improvement may be needed. For example, these conferences have informed industry efforts to ensure that captions are properly placed so as not to cover up other important on-screen information and have produced recommendations for resolving consumer complaints more efficiently. In addition, we believe these meetings have opened a dialogue that has increased appreciation for, and understanding of, the industry's efforts and advocacy groups' positions. All participants are committed to serving consumers who are deaf or hard of hearing, and working towards solutions for the inherent challenges of perfecting closed captioning.

⁵ *Closed Captioning of Video Programming*, Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, 29 FCC Rcd 2221, 2263 (2014).

Overall, these conferences have been extremely fruitful for both industry and advocates and we are grateful for the participation of TDI, the National Association of the Deaf (NAD), the Hearing Loss Association of America (HLAA) and other organizations. We plan to discuss at the upcoming meeting on October 2, 2019, the full range of current policy issues and technical developments regarding closed captioning, including many of the issues raised in the Petition. We intend to address the Commission's best practices approach to ensuring captioning quality,⁶ consumers' views of live captioning⁷ and the progress of the Disability and Rehabilitation Research Project study of captioning quality metrics.⁸ We also plan to discuss emerging closed captioning technologies such as automated speech recognition, which is critical to the instant Petition.⁹

The existing comment deadlines expire a few days before our next conference. Therefore, we request a brief extension to provide participants with a reasonable amount of time to prepare comments that reflect the relevant discussions and recommendations to be addressed during the meeting on October 2, 2019. An extension will produce more constructive comments from industry and the advocacy groups alike, and in turn, will develop a more robust record for the benefit of other interested parties and the Commission. We further submit that a short extension of time will not adversely impact any party or the public interest.

⁶ Petition at 5-14.

⁷ *Id.* at 10.

⁸ *Id.* at 15.

⁹ *Id.* at 16-18.

Accordingly, NAB and NCTA respectfully requests a 30-day extension of the comment filing deadlines in this proceeding.

Respectfully submitted,

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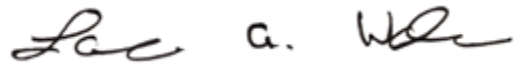
Rick Chessen

August 26, 2019

CERTIFICATE OF SERVICE

I, Larry Walke, do hereby certify that a copy of the foregoing Request for Extension was served, this 26th day of August 2019, to the following:

VIA ELECTRONIC MAIL
Blake E. Reid, Director
Samuelson-Glushko Technology Law & Policy
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A handwritten signature in black ink, appearing to read "Larry Walke", written in a cursive style.

Larry Walke